

IN THE DISTRICT COURT
HARRIS COUNTY, TEXAS
HOUSTON, TEXAS

P. 8
FILED

Chris Daniel
District Clerk

MAR 09 2016

Time:

Harris County, Texas

By

Deputy

2016 15381

ANTHONY WELCH

IN THE DISTRICT COURT

PLAINTIFF

vs.

CONN CREDIT, CYBRCOLLECT,
MID ATLANTIC FINANCE &
DIVERSIFIED CONSULTANTS

DEFENDANTS

HARRIS COUNTY, TEXAS

295th JUDICIAL DISTRICT

PLAINTIFF ORIGINAL PETITION AND APPLICATION FOR TEMPORARY
RESTRANDING ORDER

ANTHONY WELCH files this Plaintiff's Original Petition complaining of CONN CREDIT, CYBERCOLLECT, MID ATLANTIC FINANCE & DIVERSIFIED CONSULTANTS. In support thereof Plaintiff would show this Court the following:

DISCOVERY LEVEL

- I. Discovery is intended to be conducted under Discovery Level 2.

RECORDER'S MEMORANDUM
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at the time of imaging

PARTIES

2. ANTHONY WELCH ('Plaintiff') is an individual whose office is at 7322 SW Freeway, Suite 802, and Houston, Texas 77074 in Harris County, Texas.
3. CONN CREDIT ("Defendant") is and Texas Corporation authorized to conduct business in the state of Texas and uses the address: 3295 College St, Beaumont, TX 77701.
4. CYBERCOLLECT ("Defendant") is an Ohio corporation authorized to conduct business in the state of Texas and may be served by using address 3 East Oval, STE 210, and Columbus, OH 43219.
5. MID ATLANTIC FINANCE ("Defendant") is a Florida corporation authorized to conduct business in the state of Texas and may be served by using address 4592 Ulmerton Rd, Suite #201, Clear, FL 33762.
6. DIVERSIFIED CONSULTANTS ("Defendant") is a Florida corporation authorized to conduct business in the state of Texas and uses the address: 10550 Deerwood Park Blvd suite 309, Jacksonville, FL 32256.

FACTS

7. On December 9, 2015 Plaintiff received a copy of his credit report from Experian. Plaintiff was astounded to see the delinquent debts on his credit report, reported by Conn Credit, Cybrcollect, and Mid Atlantic Finance and Diversified Consultants. See attached Exhibit A, incorporated by this reference. Plaintiff knowing nothing about these debts disputed the claims. Plaintiff received no response from Defendants.

8. On December 19, 2015, Plaintiff sent a letter to Defendants demanding that the incorrect information be removed from Plaintiff's credit report, as the date of filing the petition there has been no response. See attached Exhibit B, incorporated by this reference.
9. Until the time Defendants reported this incorrect information on Plaintiff's credit report he enjoyed an excellent credit rating.
10. End of December, Plaintiff was informed by Visa that his credit limit would be decreased by \$3,500 because of the several bad debts reported on his credit report.
11. Defendant is, and at all times mentioned herein was, regularly engaged in the practice of assembling and evaluating consumer credit information on consumers for the purpose of furnishing consumer reports to third parties.

VENUE

12. Venue for this cause of action is mandatory in Harris County, Texas, because Defendant is an individual residing in Houston, Harris County, Texas.

VIOLATIONS OF THE FAIR CREDIT REPORTING ACT

Count 1 - Violation of §611 Procedure in Case of Disputed Accuracy [15 U.S.C.

§1681i]

13. 15 U.S.C. §1681i requires that once a consumer disputes the accuracy of an item on their credit report the report must be changed to reflect the disputed status or completely removed from the credit report. Plaintiff disputed the Defendants bad debt on July 7, 2015; Defendant never changed the status on Plaintiff's credit report. Further, this section also requires that Defendant respond to the consumer within 30

days of the dispute. Defendant has never responded to Plaintiff.

Count 2 - Violation of §607 Compliance Procedure [15 U.S.C. §1681e]

14. 15 U.S.C. §1681e requires that Defendants follow reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates. Defendant failed to comply with this section by allowing the inaccurate information reported by Defendants to be reflected on Plaintiff's credit report and allowing this information to remain on Plaintiff's credit report even though it had been disputed.

Count 3 – Violation of §623 Responsibilities of Furnishers of Information to Consumer Reporting Agencies [15 U.S.C. §1681s-2]

15. 15 U.S.C. §1681s-2 requires that Defendants provide Plaintiff with accurate information and shall not provide information that it knows is incorrect. Defendants wrongfully reported that Plaintiff owed said debts. Even after Defendants were informed that the information being reported was incorrect reporting continued.

APPLICATION FOR A TEMPORARY RESTRAINING ORDER

16. Plaintiff's application for a temporary restraining order is authorized by Tex. Civ. Prac. & Rem. Code §65.011(1). Specifically, Plaintiff requests the Court to Order Defendants remove the bad debts that are being wrongly reported by Defendants on Plaintiff's credit report.

17. It is probable that Plaintiff will recover from Defendants after a trial on the merits because Defendants have violated the Fair Credit Reporting Act.
18. If Plaintiff's application is not granted, harm is imminent because Plaintiff's credit is being damaged each day this incorrect information is being reported on Plaintiff's credit report.
19. The harm that will result if the temporary restraining order is not issued is irreparable because Plaintiff will lose valuable business opportunities because he cannot obtain the credit need because of reduced credit score. To date Plaintiff's Visa account has been reduced by \$3,500.00 because of his reduced credit score.
20. Plaintiff has no adequate remedy at law because the business opportunities Plaintiff is losing are one times offers. Currently Plaintiff has a contract on property in Houston, TX and may not be able to obtain the financing necessary to complete the purchase because of his reduced credit report.
21. Plaintiff is willing to post bond.
22. There is not enough time to serve notice on Defendants to hold a hearing on this application. The harm Plaintiff is suffering needs to be stopped immediately.

REQUEST FOR TEMPORARY INJUNCTION

23. Plaintiff asks the court to set its application for temporary injunction for a hearing and, after the hearing, issue a temporary injunction against Defendants.
24. Plaintiff has joined all indispensable parties under Texas Rule of Civil Procedure 39.

DAMAGES

25. Plaintiff has suffered harsh economic damage because of Defendants violation of the Fair Credit Reporting act and such damages continue to accrue.

ATTORNEYS' FEES

26. Said Defendants conduct as described herein and the resulting damage and loss to Plaintiff have made it necessary for Plaintiff to retain the attorney. By reason thereof, and by reason of 15 U.S.C. § 1681o of the Fair Credit Reporting Act, Plaintiff is entitled to recover a reasonable fee for such attorney's services in the preparation and prosecution of this action, as well as a reasonable fee for any and all appeals to other courts.

PRAYER

27. WHEREFORE, PREMISES CONSIDERED, Plaintiff, ANTHONY WELCH, requests that the Defendants, CONN CREDIT, CYBRCOLLECT, and MID ATLANTIC FINANCE, be cited to appear and answer herein, and that upon final hearing Plaintiff have Judgement against Defendant for the following:

1. Actual damages for a sum within the jurisdictional limits of the Court;

2. Pre-judgement and post judgment interest as provided by law;
3. Attorney's fees.
4. Cost of suit.
5. Such other and further relief, both general and special, at law and in equity, to which Plaintiff may show itself to justly entitle.

Respectfully submitted,

Anthony Welch
7322 SW Freeway, Suite 802
Houston, Texas 77074
713-255-7200

Unofficial Copy Office of Chris Daniel District Clerk
Clerk

STATE OF TEXAS)

HARRIS COUNTY)

)

)

VERIFICATION

Before me, the undersigned notary, on this day personally appeared Anthony Welch, the affiant, a person whose identity is known to me. After I administered an oath to affiant, affiant testified:

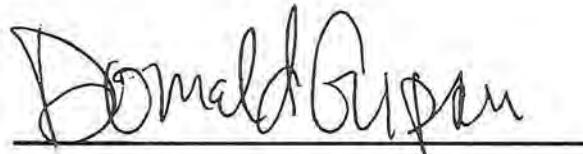
"My name is Anthony Welch. I am the Plaintiff in this action. I have read Plaintiff's Origin Petition. The facts stated in it are within my personal knowledge and are true and correct."



Anthony Welch

SWORN TO and SUBSCRIBED before me by Anthony Welch on

2/29/16



Notary Public in and for the State of Texas



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Exhibit "A"

Unofficial Copy Office of Chris Daniel District Clerk

RECORDER'S MEMORANDUM
This instrument is of poor quality
at the time of imaging

Experian - Report Summary

2/25/16, 9:25 AM

Mar 2014: \$3,000 / no data / \$50 / no data
 Feb 2014: \$3,000 / no data / \$50 / no data

The original amount of this account was \$1,694

DIVERSIFIED CONSULTANTS

Address:
 10550 DEERWOOD PARK
 BLVD 309
 JACKSONVILLE, FL 32256
 (800) 771-5361

Account Number:
 39363525

Original Creditor:
 SPRINT

Address Identification Number:
 0153922735

Status: Collection account. \$1,461 past due as of Jan 2016.

Status Details: This account is scheduled to continue on record until Jul 2020.

Date Opened: 11/2015 **Type:** Collection
Reported Since: 01/2016 **Terms:** 1 Months
Date of Status: 01/2016 **Monthly Payment:** \$0
Last Reported: 01/2016 **Responsibility:** Individual

Credit Limit/Original Amount:
 \$1,461
High Balance:
 NA
Recent Balance:
 \$1,461 as of 01/2016
Recent Payment:
 \$0

Payment History:
 2016
 JAN

Account History:
 Collection as of Jan 2016

MID ATLANTIC FINANCE

Address:
 4592 ULMERTON RD STE 200
 CLEARWATER, FL 33762
 (813) 527-7151

Account Number:
 2157....

Address Identification Number:
 0154501468

Status: Account charged off. \$5,224 written off. \$5,224 past due as of Jan 2016.

Status Details: This account is scheduled to continue on record until Sep 2020.
 This item was updated from our processing of your dispute in Oct 2012.

Date Opened: 03/2012 **Type:** Auto Loan
Reported Since: 04/2012 **Terms:** 36 Months
Date of Status: 01/2014 **Monthly Payment:** \$0
Last Reported: 01/2016 **Responsibility:** Individual

Credit Limit/Original Amount:
 \$11,414
High Balance:
 NA
Recent Balance:
 \$5,224 as of 01/2016
Recent Payment:
 \$0

Payment History:

2014											
JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB
2015											
JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB
2013											
JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL
2012											
JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL
NOV OCT SEP AUG JUL JUN MAY APR											

0834140935

Status: Open/Never late.

Date Opened:

09/2012

Type:

Credit card

Credit Limit/Original Amount:

\$2,175

Reported Since:

02/2013

Terms:

NA

High Balance:

\$2,279

Date of Status:

01/2016

Monthly Payment:

\$38

Recent Balance:

\$1,200 as of 01/2016

Last Reported:

01/2016

Responsibility:

Individual

Recent Payment:

\$597

Payment History:

2016 2015	2014
JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN	DEC NOV OCT SEP AUG JUL
2013	
JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB	

Balance History - The following data will appear in the following format:*account balance / date payment received / scheduled payment amount / actual amount paid*

Dec 2015: \$1,133 / November 12, 2015 / \$62 / no data

Nov 2015: \$795 / November 12, 2015 / \$35 / \$100

Oct 2015: \$519 / September 22, 2015 / \$35 / \$500

Sep 2015: \$1,015 / September 1, 2015 / \$35 / \$3

Aug 2015: \$1 / August 19, 2015 / \$1 / \$305

Jul 2015: \$98 / April 23, 2015 / \$35 / no data

Jun 2015: \$0 / April 23, 2015 / \$35 / no data

May 2015: \$0 / April 23, 2015 / \$35 / \$185

Apr 2015: \$185 / April 7, 2015 / \$35 / \$2,100

Mar 2015: \$2,279 / February 16, 2015 / \$95 / no data

Feb 2015: \$26 / February 16, 2015 / \$26 / \$702

Jan 2015: \$408 / January 15, 2015 / \$35 / \$200

Between Sep 2015 and Dec 2015, your credit limit/high balance was \$2,175

Between Jan 2015 and Aug 2015, your credit limit/high balance was \$775

CAPITAL ONE**Address:**

PO BOX 30285

SALT LAKE CITY, UT 84130

(800) 227-4825

Address Identification Number:

0824432256

Status: Open/Never late.

Date Opened:

07/2015

Reported Since:

08/2015

Date of Status:

02/2016

Last Reported:

02/2016

Payment History:

2016 2015	2014
FEB JAN DEC NOV OCT SEP AUG	

Account Number:

415417760191....

Credit Limit/Original Amount:

\$1,500

High Balance:

\$845

Recent Balance:

\$219 as of 02/2016

Recent Payment:

\$0

Balance History - The following data will appear in the following format:*account balance / date payment received / scheduled payment amount / actual amount paid*

Jan 2016: \$245 / December 30, 2015 / \$15 / no data

Dec 2015: \$400 / October 20, 2015 / \$15 / no data

Nov 2015: \$165 / October 20, 2015 / \$15 / no data

Oct 2015: \$266 / September 19, 2015 / \$15 / no data

Sep 2015: \$243 / August 18, 2015 / \$15 / no data
 Aug 2015: \$110 / no data / \$15 / no data

Between Dec 2015 and Jan 2016, your credit limit/high balance was \$1,500
 Between Aug 2015 and Nov 2015, your credit limit/high balance was \$500

CONNS CREDIT CORP

Address: Account
 3295 COLLEGE ST Number:
 BEAUMONT, 20372...
 TX 77701
 (409) 832-1696

Address Identification Number:
 0771706603

Status: Paid, Closed/Never late.

Status Details: This account is scheduled to continue on record until Jun 2025.

Date Opened: Type:
 05/2013 Secured Loan

Credit Limit/Original Amount:

\$502

Reported Since: Terms:
 05/2013 18 Months

High Balance:

NA

Date of Status: Monthly Payment:
 06/2015 \$0

Recent Balance:

NA

Last Reported: Responsibility:
 06/2015 Individual

Recent Payment:

NA

Payment History:

2015	2014	2013																	
JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB	JAN	DEC	

NOV OCT SEP AUG JUL JUN MAY

Balance History - The following data will appear in the following format:

account balance / date payment received / scheduled payment amount / actual amount paid

May 2015: \$98 / January 7, 2015 / \$27 / no data

Apr 2015: \$98 / January 7, 2015 / \$27 / no data

Apr 2015: \$98 / January 7, 2015 / \$27 / no data

Feb 2015: \$98 / January 7, 2015 / \$27 / no data

Jan 2015: \$98 / January 7, 2015 / \$27 / \$26

Dec 2014: \$124 / November 2, 2014 / \$27 / no data

Nov 2014: \$124 / November 2, 2014 / \$27 / \$24

Oct 2014: \$149 / October 3, 2014 / \$27 / \$45

Sep 2014: \$194 / September 14, 2014 / \$27 / \$10

Aug 2014: \$175 / August 29, 2014 / \$27 / \$26

Jul 2014: \$201 / July 23, 2014 / \$27 / \$27

Jun 2014: \$229 / June 27, 2014 / \$27 / \$27

May 2014: \$257 / May 28, 2014 / \$27 / \$27

Apr 2014: \$255 / April 26, 2014 / \$27 / \$55

Mar 2014: \$310 / February 7, 2014 / \$27 / no data

Feb 2014: \$310 / February 7, 2014 / \$27 / \$238

The original amount of this account was
 \$502

CONNS CREDIT CORP

Address: Account
 3295 COLLEGE ST Number:
 BEAUMONT, 20372...
 TX 77701
 (409) 832-1696

Address Identification Number:

0154501468

Status: Paid, Closed/Never late.

Status Details: This account is scheduled to continue on record until Aug 2023.

Date Opened:	Type:	Credit Limit/Original Amount:
07/2013	Secured Loan	\$378
Reported Since:	Terms:	High Balance:
03/2013	18 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
08/2013	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
08/2013	Individual	NA

Payment History:

2013
 AUG JUL JUN MAY APR MAR

CONNS CREDIT CORP

Address: Account
 3295 COLLEGE ST Number:
 BEAUMONT, 20372....
 TX 77701
 (409) 832-1696

Address Identification Number:
 0154501468

Status: Paid, Closed/Never late.

Status Details: This account is scheduled to continue on record until Sep 2023.

Date Opened:	Type:	Credit Limit/Original Amount:
07/2013	Secured Loan	\$220
Reported Since:	Terms:	High Balance:
04/2013	8 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
09/2013	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
09/2013	Individual	NA

Payment History:

2013
 SEP AUG JUL JUN MAY APR

CONNS CREDIT CORP

Address: Account
 3295 COLLEGE ST Number:
 BEAUMONT, 20372....
 TX 77701
 (409) 832-1696

Address Identification Number:
 0812592285

Status: Paid, Closed/Never late.

Status Details: This account is scheduled to continue on record until Sep 2023.

Date Opened:	Type:	Credit Limit/Original Amount:
08/2013	Secured Loan	\$546
Reported Since:	Terms:	High Balance:
09/2012	12 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
09/2013	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
09/2013	Individual	NA

Payment History:

2013 2012

SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP

CONNS CREDIT CORP**Address:** Account

3295 COLLEGE ST Number:

BEAUMONT, 20372...

TX 77701

(409) 832-1696

Address Identification Number:
0771706603**Status:** Paid, Closed/Never late.**Status Details:** This account is scheduled to continue on record until Jul 2025.**Date Opened:** Type: Secured Loan

\$548

Reported Since: Terms: 18 Months

NA

Date of Status: Monthly Payment:

NA

07/2015 \$0

Last Reported: Responsibility: Individual

NA

Payment History:

2015	2014
JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG	JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG

2013	2014
DEC NOV OCT SEP AUG	JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG

Balance History - The following data will appear in the following format:*account balance / date payment received / scheduled payment amount / actual amount paid*

Jun 2015: \$150 / June 7, 2015 / \$30 / \$30

May 2015: \$181 / January 7, 2015 / \$30 / no data

Apr 2015: \$181 / January 7, 2015 / \$30 / no data

Apr 2015: \$181 / January 7, 2015 / \$30 / no data

Feb 2015: \$181 / January 7, 2015 / \$30 / no data

Jan 2015: \$181 / January 7, 2015 / \$30 / \$30

Dec 2014: \$211 / November 2, 2014 / \$30 / no data

Nov 2014: \$211 / November 2, 2014 / \$30 / \$30

Oct 2014: \$242 / September 30, 2014 / \$30 / no data

Sep 2014: \$242 / September 30, 2014 / \$30 / \$30

Aug 2014: \$242 / August 29, 2014 / \$30 / \$30

Jul 2014: \$273 / July 23, 2014 / \$30 / \$30

Jun 2014: \$303 / June 27, 2014 / \$30 / \$30

May 2014: \$334 / May 28, 2014 / \$30 / \$30

Apr 2014: \$334 / April 28, 2014 / \$30 / \$60

Mar 2014: \$395 / March 1, 2014 / \$30 / \$30

Feb 2014: \$425 / February 23, 2014 / \$30 / \$337

The original amount of this account was
\$548**CONNS CREDIT CORP****Address:** Account

3295 COLLEGE ST Number:

BEAUMONT, 20372...

TX 77701

(409) 832-1696

Address Identification Number:
0771706603**Status:** Paid, Closed/Never late.**Status Details:** This account is scheduled to continue on record until Sep

Nov 2015: \$98,987 / September 2, 2015 / \$600 / no data
 Oct 2015: \$98,033 / September 2, 2015 / \$600 / \$500
 Sep 2015: \$95,578 / August 21, 2015 / \$600 / \$500
 Aug 2015: \$89,857 / July 17, 2015 / \$600 / \$250
 Jul 2015: \$89,307 / April 17, 2015 / \$600 / no data
 Jun 2015: \$53,000 / April 17, 2015 / \$600 / no data
 May 2015: \$52,400 / April 17, 2015 / \$600 / \$1,200
 Apr 2015: \$53,000 / February 9, 2015 / \$600 / no data
 Mar 2015: \$52,400 / February 9, 2015 / \$600 / \$1,200
 Feb 2015: \$53,000 / January 26, 2015 / \$600 / \$1,200
 Jan 2015: \$53,800 / no date / \$800 / no data
 Dec 2014: \$53,000 / no date / \$600 / no data
 Nov 2014: \$53,000 / February 20, 2014 / \$600 / \$0

PAYLIANCE

Address:
3 EASTON OVAL STE 210
COLUMBUS, OH 43219
(877) 892-4325

Address Identification Number:
0789662586

Status: Paid, Closed.

Date Opened: 07/2013 **Type:** Collection

Reported Since: 10/2013 **Terms:** 1 Months

Date of Status: 08/2014 **Monthly Payment:** \$0

Last Reported: 08/2014 **Responsibility:** Individual

Payment History:

2014	AUG	JUL	JUN	MAY	APR	MAR	FEB	JAN	2013	DEC	NOV	OCT
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Account History:

Collection as of Oct 2013

Account Number:
179....

Original Creditor:
USPS 770 HOUSTON TX

Credit Limit/Original Amount:

\$430

High Balance:

NA

Recent Balance:

NA

Recent Payment:

NA

PAYLIANCE

Address:
3 EASTON OVAL STE 210
COLUMBUS, OH 43219
(877) 892-4325

Address Identification Number:
0789662586

Status: Paid, Closed.

Date Opened: 10/2013 **Type:** Collection

Reported Since: 01/2014 **Terms:** 1 Months

Date of Status: 05/2014 **Monthly Payment:** \$0

Last Reported: 05/2014 **Responsibility:** Individual

Payment History:

2014	MAY	APR	MAR	FEB	JAN
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Account History:

Collection as of Jan 2014

Account Number:
184....

Original Creditor:
USPS 770 HOUSTON TX

Credit Limit/Original Amount:

\$256

High Balance:

NA

Recent Balance:

NA

Recent Payment:

NA

Nov 2015: \$96,987 / September 2, 2015 / \$600 / no data
 Oct 2015: \$96,033 / September 2, 2015 / \$600 / \$500
 Sep 2015: \$95,578 / August 21, 2015 / \$600 / \$500
 Aug 2015: \$89,657 / July 17, 2015 / \$600 / \$250
 Jul 2015: \$89,307 / April 17, 2015 / \$600 / no data
 Jun 2015: \$53,000 / April 17, 2015 / \$800 / no data
 May 2015: \$52,400 / April 17, 2015 / \$800 / \$1,200
 Apr 2015: \$53,000 / February 9, 2015 / \$600 / no data
 Mar 2015: \$52,400 / February 9, 2015 / \$800 / \$1,200
 Feb 2015: \$53,000 / January 26, 2015 / \$600 / \$1,200
 Jan 2015: \$53,800 / no data / \$800 / no data
 Dec 2014: \$53,000 / no data / \$800 / no data
 Nov 2014: \$53,000 / February 20, 2014 / \$600 / \$0

PAYLIANCE

Address:
 3 EASTON OVAL STE 210
 COLUMBUS, OH 43219
 (877) 892-4325

Address Identification Number:
 0789662586

Status: Paid, Closed.

Date Opened:

07/2013

Reported Since:

10/2013

Date of Status:

08/2014

Last Reported:

08/2014

Payment History:

2014	2013
AUG	JUL
JUN	MAY
MAY	APR
APR	MAR
MAR	FEB
FEB	JAN
JAN	DEC
DEC	NOV
NOV	OCT

Account Number:
 179...

Original Creditor:
 USPS 770 HOUSTON TX

Credit Limit/Original Amount:

\$430

High Balance:

NA

Recent Balance:

NA

Recent Payment:

NA

Account History:

Collection as of Oct 2013

PAYLIANCE

Address:
 3 EASTON OVAL STE 210
 COLUMBUS, OH 43219
 (877) 892-4325

Address Identification Number:
 0789662586

Status: Paid, Closed.

Date Opened:

10/2013

Reported Since:

01/2014

Date of Status:

05/2014

Last Reported:

05/2014

Payment History:

2014	2013
MAY	APR
APR	MAR
MAR	FEB
FEB	JAN

Account Number:
 184...

Original Creditor:
 USPS 770 HOUSTON TX

Credit Limit/Original Amount:

\$266

High Balance:

NA

Recent Balance:

NA

Recent Payment:

NA

Account History:

Collection as of Jan 2014

Sep 2015: \$243 / August 18, 2015 / \$15 / no data
 Aug 2015: \$110 / no data / \$15 / no data

Between Dec 2015 and Jan 2016, your credit limit/high balance was \$1,500
 Between Aug 2015 and Nov 2015, your credit limit/high balance was \$500

CONN'S CREDIT CORP

Address: Account
 3295 COLLEGE ST Number:
 BEAUMONT, 20372....
 TX 77701

(409) 832-1696

Address Identification Number:
 0771706603

Status: Paid, Closed/Never late.**Status Details:** This account is scheduled to continue on record until Jun 2025.

Date Opened: Type:
 05/2013 Secured Loan

Credit Limit/Original Amount:
 \$502

Reported Since: Terms:
 05/2013 18 Months

High Balance:

Date of Status: Monthly Payment:
 06/2015 \$0

NA

Last Reported: Responsibility:
 06/2015 Individual

Recent Balance:

NA

Recent Payment:

NA

Payment History:

2015						2014						2013						
JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB	JAN	DEC

NOV	OCT	SEP	AUG	JUL	JUN	MAY
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Balance History - The following data will appear in the following format:

account balance / date payment received / scheduled payment amount / actual amount paid

May 2015: \$98 / January 7, 2015 / \$27 / no data

Apr 2015: \$98 / January 7, 2015 / \$27 / no data

Apr 2015: \$98 / January 7, 2015 / \$27 / no data

Feb 2015: \$98 / January 7, 2015 / \$27 / no data

Jan 2015: \$98 / January 7, 2015 / \$27 / \$26

Dec 2014: \$124 / November 2, 2014 / \$27 / no data

Nov 2014: \$124 / November 2, 2014 / \$27 / \$24

Oct 2014: \$149 / October 3, 2014 / \$27 / \$45

Sep 2014: \$194 / September 14, 2014 / \$27 / \$10

Aug 2014: \$175 / August 29, 2014 / \$27 / \$26

Jul 2014: \$201 / July 23, 2014 / \$27 / \$27

Jun 2014: \$229 / June 27, 2014 / \$27 / \$27

May 2014: \$257 / May 28, 2014 / \$27 / \$27

Apr 2014: \$255 / April 26, 2014 / \$27 / \$55

Mar 2014: \$310 / February 7, 2014 / \$27 / no data

Feb 2014: \$310 / February 7, 2014 / \$27 / \$238

The original amount of this account was
 \$502

CONN'S CREDIT CORP

Address: Account
 3295 COLLEGE ST Number:
 BEAUMONT, 20372....
 TX 77701

(409) 832-1696

Address Identification Number:

0154501468

Status: Paid, Closed/Never late.

Status Details: This account is scheduled to continue on record until Aug 2023.

Date Opened:	Type:	Credit Limit/Original Amount:
07/2013	Secured Loan	\$378
Reported Since:	Terms:	High Balance:
03/2013	18 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
08/2013	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
08/2013	Individual	NA

Payment History:

2013
 AUG JUL JUN MAY APR MAR

CONNS CREDIT CORP

Address: Account
 3295 COLLEGE ST Number:
 BEAUMONT, 20372....
 TX 77701

(409) 832-1696

Address Identification Number:
 0154501468

Status: Paid, Closed/Never late.

Status Details: This account is scheduled to continue on record until Sep 2023.

Date Opened:	Type:	Credit Limit/Original Amount:
07/2013	Secured Loan	\$220
Reported Since:	Terms:	High Balance:
04/2013	8 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
09/2013	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
09/2013	Individual	NA

Payment History:

2013
 SEP AUG JUL JUN MAY APR

CONNS CREDIT CORP

Address: Account
 3295 COLLEGE ST Number:
 BEAUMONT, 20372....
 TX 77701

(409) 832-1696

Address Identification Number:
 0812592285

Status: Paid, Closed/Never late.

Status Details: This account is scheduled to continue on record until Sep 2023.

Date Opened:	Type:	Credit Limit/Original Amount:
08/2013	Secured Loan	\$546
Reported Since:	Terms:	High Balance:
09/2012	12 Months	NA
Date of Status:	Monthly Payment:	Recent Balance:
09/2013	\$0	NA
Last Reported:	Responsibility:	Recent Payment:
09/2013	Individual	NA

Payment History:

2013 2012

0634140935

Status: Open/Never late.

Date Opened:

09/2012

Reported Since:

02/2013

Date of Status:

01/2016

Last Reported:

01/2016

Payment History:

2016												2015												2014													
JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB		
JUN	MAY	APR	MAR	FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	MAR	FEB																					

Balance History - The following data will appear in the following format:*account balance / date payment received / scheduled payment amount / actual amount paid*

Dec 2015: \$1,133 / November 12, 2015 / \$62 / no data

Nov 2015: \$795 / November 12, 2015 / \$35 / \$100

Oct 2015: \$519 / September 22, 2015 / \$35 / \$500

Sep 2015: \$1,015 / September 1, 2015 / \$35 / \$3

Aug 2015: \$1 / August 19, 2015 / \$1 / \$305

Jul 2015: \$98 / April 23, 2015 / \$35 / no data

Jun 2015: \$0 / April 23, 2015 / \$35 / no data

May 2015: \$0 / April 23, 2015 / \$35 / \$185

Apr 2015: \$185 / April 7, 2015 / \$35 / \$2,100

Mar 2015: \$2,279 / February 16, 2015 / \$95 / no data

Feb 2015: \$26 / February 18, 2015 / \$26 / \$702

Jan 2015: \$408 / January 15, 2015 / \$35 / \$200

Between Sep 2015 and Dec 2015, your credit limit/high balance was \$2,175

Between Jan 2015 and Aug 2015, your credit limit/high balance was \$775

CAPITAL ONE

Address:

PO BOX 30285
SALT LAKE CITY, UT 84130
(800) 227-4825

Address Identification Number:

0824432256

Status: Open/Never late.

Date Opened:

07/2015

Reported Since:

08/2015

Date of Status:

02/2016

Last Reported:

02/2016

Payment History:

2016						2015					
FEB	JAN	DEC	NOV	OCT	SEP	AUG	JUL	JUN	MAY	APR	FEB

Account Number:

415417750191....

Type:

Business Card

Terms:

NA

Monthly Payment:

\$15

Responsibility:

Individual

Credit Limit/Original Amount:

\$1,500

High Balance:

\$845

Recent Balance:

\$218 as of 02/2016

Recent Payment:

\$0

Balance History - The following data will appear in the following format:*account balance / date payment received / scheduled payment amount / actual amount paid*

Jan 2016: \$245 / December 30, 2015 / \$15 / no data

Dec 2015: \$400 / October 20, 2015 / \$15 / no data

Nov 2015: \$165 / October 20, 2015 / \$15 / no data

Oct 2015: \$266 / September 19, 2015 / \$15 / no data

P.6

Exhibit "B"

Unofficial Copy Office of Chris Daniel District Clerk

RECORDER'S MEMORANDUM
This instrument is of poor quality
at the time of imaging

Anthony Welch

7322 SW Freeway, Suite 802

Houston, Texas 77074

December 19, 2015

Conn Credit

3295 College St.

Beaumont, TX 77701

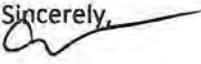
Dear Sir or Madam:

I am writing to dispute the following information in my file. I have circled the items I dispute on the attached copy of the report I received.

This items disputed was paid in full and never late. Please delete it immediately...

Enclosed are copies of the credit report showing the false items? Please reinvestigate these matters and delete or correct the disputed items as soon as possible.

Sincerely,


Anthony Welch

Enclosures: (Copy of my credit report)

Anthony Welch

7322 SW Freeway, Suite 802

Houston, Texas 77074

December 19, 2015

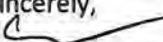
Cyber collect
3 East Oval Suites 210
Columbus, OH 43219

Dear Sir or Madam:

I am writing to dispute the following information in my file. I have circled the items I dispute on the attached copy of the report I received.

This items disputed was paid in full and never late. Please delete it immediately...

Enclosed are copies of the credit report showing the false items. Please reinvestigate these matters and delete or correct the disputed items as soon as possible.

Sincerely,

Anthony Welch

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Anthony Welch

7322 SW Freeway, Suite 802

Houston, Texas 77074

December 19, 2015

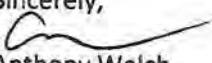
Mid-Atlantic Finance
4592 Ulmerton Road, Suite 201
Clearwater, FL 33762

Dear Sir or Madam:

I am writing to dispute the following information in my file. I have circled the items I dispute on the attached copy of the report I received.

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Sincerely,

Anthony Welch

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Anthony Welch

7322 SW Freeway, Suite 802

Houston, Texas 77074

December 19, 2015

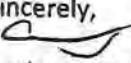
Diversified Consultants
10550 Deerwood Park Blvd, Suite 309
Jacksonville, FL 32256

Dear Sir or Madam:

I am writing to dispute the following information in my file. I have circled the items I dispute on the attached copy of the report I received.

This items disputed was paid in full and never late. Please delete it immediately...

Enclosed are copies of the credit report showing the false items. Please reinvestigate these matters and delete or correct the disputed items as soon as possible.

Sincerely,

Anthony Welch

Enclosures: (Copy of my credit report)